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*Counsel for Defendant Libre by Nexus, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

JUAN QUINTANILLA VASQUEZ,  
GABRIELA PERDOMO ORTIZ, VICTOR  
HUGO CATALAN MOLINA, AND KEVIN  
CALDERON, INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS SIMILARLY  
SITUATED,

Plaintiff,

v.

LIBRE BY NEXUS, INC. and JOHN DOES 1-  
50,

Defendants.

Case No. 4:17-cv-00755-CW

Action Filed: **Notice of Representation**

**TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

The following statement is submitted to clarify the scope of representation of undersigned counsel in this matter. Undersigned counsel previously moved to withdraw his representation of Defendant Libre By Nexus, Inc. ("Libre"). Pending a ruling on that motion, undersigned counsel continues to represent Libre. However, undersigned counsel does not represent the principals of Libre, Michael Donovan and Evan Ejin, in their personal capacities for any purpose.

1           Undersigned counsel may have caused some confusion as to this representation at  
2 the last hearing in this matter. Michael Donovan and Evan Ejin are shareholders of Libre and  
3 officers and directors of the company. Undersigned counsel represented them strictly in their  
4 corporate capacity as owners, officers and directors of Libre.  
5

6           Undersigned counsel is only authorized to represent Libre having appeared *pro hac*  
7 *vic* for that purpose. He has not been retained by Donovan and Ejin and has no authority to  
8 represent them in their individual capacities before this Court.  
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10 Dated: December 7, 2022  
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14 JOHN M. SHOREMAN, ESQ. (*PRO HAC*  
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By: /s/ John M. Shoreman  
John M. Shoreman, Esq. (*Pro Hac Vice*)

Attorneys for Counsel for Defendant Libre by  
Nexus, Inc.